

# Exhibit A-1

**April 26, 2020 through September 26, 2023**

4/26/2020;

1.5 hours @ 75% =

**1.125 hours**

Review of Cohen Law defendants' Answer to amended complaint; review of Dorland's answer and counterclaim for Copyright Infringement and related relief filed by Dorland; copied and emailed to Larson; preparation and filing of proposed joint statement of counsel.

4/24 - 5/15/2020

5.0 hours, 4.3 hours,

2.1 hours, 6.0 hours,

.5 hours, 2.0 hours,

4.0 hours, 2.5 hours,

1.5 hours, 4.0 hours,

4.5 hours, 2.0 hours,

5.0 hours, 4.0 hours,

9.0 hours, 7.0 hours,

6.0 hours, 2.0 hours,

5.0 hours, 4.0 hours,

9.0 hours, 7.0 hours,

6.0 hours = 102.4 hours

102.4 hours @ 75% =

**76.8 hours**

Research and beginning of preparation in numerous drafts of Motion to Dismiss Dorland's Counterclaims under Rule 12(b)(6); compilation of documents, emails to Larson, research, writing and fact investigation; final preparation of Motion and Memorandum and Certificate of Consultation under Local Rule 7.1; filing of Motion, Memo with 9 attachments and Certification. Filing of motion to substitute incorrect exhibit for proper exhibit.

5/20/2020;

**.2 hours**

Letter to court with courtesy copies of Motion and Memorandum.

6/19/2020

**.5 hours**

Review of Dorland's Opposition to Motion to Dismiss under Rule 12(b)(6) with copy to client.

7/1/2020

.6 hours

**No time allocated directly to copyright counterclaims**

Review of Motion for Judgment on the Pleadings by Cohen Defendants and Memo in support; copy to client.

7/6,7, 8-15/2020

3.6 hours, 4.0 hours,  
6.5 hours, 2.5 hours,  
5.0 hours, 3.5 hours,  
.7 hours, 7.0 hours,  
5.0 hours, 5.0 hours,  
5.0 hours, 2.5 hours,  
2.0 hours, 2.0 hours,  
2.5 hours, 3.7 hours] =  
60.5 hours @ 75% =  
**45.375 hours**

Research and preparation of Motion for Leave to file Second Amended Complaint and Memorandum in support with 11 Attachments; preparation of Second Amended complaint and filing in court with Cert. of Consultation under Rule 7.1; telephone call and emails; research and writing of two oppositions (1) Motion to Dismiss of Cohen Law Defendants for lack of jurisdiction, and (2) Motion to Dismiss of Dorland to Larson's Counts I, II, V and VIII; numerous emails with Larson and filing in court with affidavits.

7/29/2020

**.5 hours**

Review of Oppositions to Motion to Amend Complaint and email to Larson with copies.

8/14/2020

**.5 hours**

Review of Judge Talwani's order granting Larson's Motion for Leave to Amend her complaint and denying the Cohen Defendants' Motion for Judgment on the Pleadings; copy to client.

8/16/2020

.8 hours @ 50% =

**.4 hours**

Filing of Second Amended Complaint in court with leave granted together with 16 exhibits.

8/31-9/1/2020;

**.4 hours**

Conference with counsel re: Cohen Defendants' Motion to extend discovery and other deadlines.

9/4, 8/2020

.4 hours @ 50% =

**.2 hours**

Review of Cohen Defendants' answer to Second Amended Complaint and copy to Larson; review of Dorland's answer to Second Amended Complaint and Counterclaim.

10/2/2020

**2.5 hours**

Began preparation of answers to interrogatories in draft form.

1/6-7/2021

**15.3 hours**

Compilation and preparation of documents for production of documents; copying of documents in office.

1/15/2021

**.8 hours**

Preparation for and telephone conference with Elovecky and Greene regarding alleged discovery deficiencies.

1/27/2021

**1.8 hours**

Preparation of Motion for Protective Order and to extend scheduling order deadlines, circulation to counsel for Cohen and Dorland; preparation of Cert. under Rule 7.1 and filing with court.

2/2/2021

1.9 hours @ 60% =

**1.14 hours**

Review of Judge Talwani's order, granting in part and denying in Part Larson's Motion to dismiss under Rule 12(b)(6); copy to Larson with email explanation; numerous emails with Nancy Perlman, attorney for GrubStreet regarding stipulation for protective order circulated by Suzanne Elovecky; suggested changes to stipulation; further review of court order and email to client, Jennifer Farrell Esq. and Kritika Shukla, Esq.; email to Matt Greene, Esq. regarding depositions of Cohen Defendants.

2/3/2021

1.6 hours @ 50% =

**.8 hours**

Research to answer client question regarding email to Kritika Shukla, Esq. regarding deposition and litigation privilege; email to Suzanne Elovecky regarding Stipulation and proposed Order; email with client; quick review of subpoenaed documents; email and review of email from Elovecky regarding document dispute.

2/4-5/2021

5.0 hours @ 50% =

**2.5 hours**

Continuing work on production of documents; long telephone conversation with Larson; meeting in Somerville to pick up smart card with further documents from client; copying in office of 425 additional pages of documents (4 sets) for production plus 115 pages of additional documents supplied by Suzanne Elovecky and 1500 copies of Boston Book Festival ("BBF") documents. Total copies made: 3,315; US Express Mail postage to attorneys.

2/8-9/2021

4.1 hours

**No time allocated directly to copyright counterclaims**

Research re: litigation privilege on cases found by Kritika Shukla, Esq.; preparation of notices of deposition of Defendants and email to attorneys and follow-up emails; review of BBF subpoena production; emails with Suzanne Elovecky and client.

2/11, 12, 13, 14, 15/2021

2.8 hours, 5.0 hours,

2.8 hours, 1.0 hours,

2.0 hours, 1.3 hours,

2.0 hours, 1.8 hours,

1.6 hours =

**20.3 hours.**

Work on answer to Dorland's Counterclaim, document production and interrogatories; numerous emails to Larson; review of BBF production; long telephone conversation with Larson, deposition preparation and questions.

2/17/2021

**1.9 hours**

Preparation of Motion to Enlarge Time; telephone conversation with client; circulation among attys; email from Matt Greene, Esq.; changes to Motion to Enlarge Time; email to Suzanne Elovecky; prep of Rule 7.1 certification; filing of Motion in court; work on answer to Counterclaim and affirmative defenses; telephone conversation with Larson regarding deposition and discovery.

2/18/2021

**3.9 hours**

Finish answer to Counterclaim; sent to client for review; work on interrogatories; filing of answer in court through ECF; work on interrogatories to Dorland and email with client.

2/19, 22, 23 & 24/ 2021  
1.0, 3.5, 2.9, 1.2,  
1.6 hours = 10.2 hours  
10.2 hours @ 75% =  
**7.65 hours**

More work on interrogatories ; numerous emails with Larson – fact investigation re: information about lawsuit involving Christopher Perry (husband of Dorland); work on interrogatories; letter to Larson; refinement of interrogatories after review by client; email to/from Larson.

2/25/2021  
**2.2 hours**

Final work on Second Request for Documents to Dorland; sent to client for further comments and to attorneys for service; review of documents supplied by Cohen Law and research.

3/8-10/2021  
2.1 hours @ 50% =  
**1.05 hours**

Long letter to Miles Siegel, Esquire for consult on procedure and tactics; letter to insurance company and email and Express Mail.

3/11-12/2021  
**.5 hours**

Letter to Elovecky and Greene with renewed deposition notices sent to all Defendants.

3/15/2021  
**.6 hours**

Review of Dorland's Motion to Compel and Memo.

3/17-18/2021  
.8, .3, .4, 1.4, 1.3, .7 hours =  
**4.9 hours**

Telephone consult with Miles Siegel, Esquire; three emails to/from Jeff Smokler, public relations specialist for consult on press publicity; telephone call with Larson; conference telephone call with Larson and Robert Kolker; telephone call with Ethan Bassoff re: expert witness; email and telephone call with Larson re: story.

3/19, 20, 21/2021

.5, 2.5, .5, 2.5=

**6.0 hours**

Organized Dorland's documents from Minecraft and initial review of Motion to Compel; examination of documents and taking notes from same; start of approach to motion to compel; two telephone calls with Larson and emails of documents.

3/22/2021

**4.7 hours**

Work on Opposition to Motion to Compel

3/23/2021

**10.9 hours**

More work on memo and review of pertinent telephone messages.

3/25-26/2021

3.0, 1.5, 2.4, .5 =

**7.4 hours**

Long telephone call with Larson; second draft of opposition; went through discovery; started preparation for depositions; telephone call with Larson and Robert Kolker; Express Mail to attorney with documents of thumb drive.

3/27-28/2021

.5, 2.3, 1.8, 2.0 =

**6.6 hours**

Telephone call from Larson re: strategy; more work on opposition.

3/29/2021

3.0, 4.0 =

**7.0 hours**

Finished Memo and exhibits; filed in court; numerous telephone calls with Larson and preparation of affidavit.

4/1/2021

**2.0 hours**

Telephone call with Larson and possible witnesses including Sari Bowen and Adam Stumacker.



4/3, 4, 5/2021

2.0, 2.2, 1.9, 1.8, 2.3,  
.8 hours =

**11.0 hours**

Email with Larson re: discovery; preparation of Motion to Compel, numerous telephone conversations and texts with Larson; telephone conference with Suzanne Elovecky and Matthew Greene re: Rule 7.1 Motion conference; filing of Motion on emergency basis; Court appearance via ZOOM with Judge Talwani; follow-up telephone conversation with Larson.

4/11-14/2021

**3.0 hours**

Telephone conversation with Larson and Sarah Green, editor of Welcome to the Neighborhood anthology; work of documents and deposition preparation; email with Larson and telephone call with Nancy Perlman, Esq., atty for GrubStreet.

4/20, 21, 22/2021

1.4, 4.0, 2.1, .8,  
2.5 hours =

**10.8 hours**

Review of Opposition to Motion to Compel; email to Larson, notes; start work on Reply to Motion and Affidavit.

4/23/2021

.9, 1.5, 2.0 = 4.4 hours @50% =

**2.2 hours**

Telephone conversation with Julie Carter; work on Memo and research.

4/25-29/2021

1.6, 3.2, 3.5, 1.8, 2.2, 3.8,  
3.1, 1.2, .7, 1.0, .5 =

**22.6 hours**

Preparation of Reply to Opposition to Motion to Compel and affidavits and compilation of exhibits; telephone conf. with Larson.

4/29/2021

**.3 hours**

Review of protective order from Suzanne Elovecky, Esq. and email to Nancy Perlman, Esq. atty for GrubStreet; assent to Motion.

5/7/2021

**.5 hours**

Obtain and review "Using Sources Effectively" for insight on plagiarism from academic viewpoint.

5/11-12/2021

**1.0 hours**

Receipt of subpoenaed documents from Bread Loaf Conference at Middlebury College and transcription of telephone message from Dorland to College; forward to client, two follow up emails re: deposition; questions to Miles Siegel, Esq.; email to client with question and request to follow up on Dorland's emails to Larson's friends with copies of texts produced in discovery.

5/13-14, 17/2021

**7.9 hours**

Research and preparation for court hearing before Judge Marianne Bowler on competing Motions to Compel Discovery; Court hearing on 5/14; telephone conference with Larson; preparation for and participation in Court hearing on 5/17; telephone conference with Larson.

Copies: \$24.25

5/19/21

**.6 hours**

Review of revised stipulation regarding confidential documents from GrubStreet and suggested revisions; emails to Elovecky; several emails to set up Rule 7.1 conference.

5/19/21

**.3 hours**

Rule 7.1 meet and confer telephone call with Atty. Elovecky and attorney from Matthey Green's office as order regarding discovery.

6/2-4/21

**4.3 hours**

Compilation and production of additional documents to Attorneys Elovecky and Green; letter to attorneys.

Photocopies (736): \$110.40

Postage: \$19.10

Staples: \$56.90

6/22/21

**.4 hours**

Telephone conversation with Sonya Larson regarding deposition and Dorland production of documents.

7/6-7, 9/21

**2.0 hours**

Preparation of Request for Extension of Time regarding discovery; Local Rule 7.1 Conference; several emails back and forth to attorneys; email with Larson regarding dates for depositions; preparation of Deposition Notices and changes, letter; filing of extension Motion with court; telephone conversation with Julie Carter, email, disbursements to Larson.

7/22-23, 28-30/21

.3; 3.9, 4.1, 8.5 =

**16.8 hours**

Telephone call from Larson regarding deposition preparation; preparation for Zoom conference and witness preparation of Larson, additional preparation of Larson for deposition and long deposition of Sonya Larson.

8/13-19/21

4.0, 2.0, 1.0, 6.9,

4.5, 7.6, 8.5 =

**34.5 hours**

Research litigation privilege, work product, attorney-client privilege; review of objections to topics of Rule 30(b)(6) deposition; compilation of exhibits; email to Matthew Green, attorney for Cohen Defendants and stenographer.

8/26-7, 29-31, 9/1-3/21  
5.0, 3.4, 4.5, 4.0,  
3.0, 5.0, 3.0, 7.6,  
7.5 = 43.0 hours @ 75% =  
**32.25 hours**

Extensive consultation and strategy session with Attorney Miles Seigle, email, research; telephone conference with Larson; outline of questioning of Cohen Defendants; preparation of requests for documents and admissions from Cohen Defendants; research with Larson as limited public figure; fact investigation of additional lawsuits filed by Cohen Defendants.

9/17-18, 20-22/21  
.3, 1.0, 1.0, 3.4,  
6.0, 8.5 =  
**20.2 hours**

Several emails with attorneys trying to schedule depositions; telephone conversation with Larson and start of deposition preparation and motion for Summary Judgment; part I of deposition of Dawn Dorland Perry.

9/23/21  
**1.5 hours**

Fact checking telephone conversation with Steven Stern of the NY Times.

9/24-28/21  
3.0, 2.0, 2.4,  
2.3, 1.8, 1.0,  
5.3 =  
**17.8 hours**

Start of research and preparation of Motion for Summary Judgment; Part II of Larson deposition.

9/30, 10/1 & 4/21;  
**4.1 hours**

Review of and preparation and filing of Opposition to Cohen Law's Motion to Compel, revisions by Larson.

10/5/21  
**1.0 hours**

Reading of NY Time Magazine article on Bad Art Friends.

10/12, 14-15/21;

.4, .5, 1.0, 1.6 =

**3.5 hours**

Preparation for Zoom court appearance and follow-up in court appearance; telephone conversation with client; research re: bad faith litigation; email and telephone conversation with Larson; email to attorneys regarding Local Rule 7.1 conference.

10/19-21/21

**5.8 hours**

Telephone conversation with Larson; preparation for Zoom call with attorneys, research; review of requests for admission; follow-up telephone conversation with Attorneys Matthew Greene and Suzanne Elovecky, research, preparation of request for Mediation.

12/10/21

**.5 hours**

Several emails to Larson regarding mediation memo for Judge Cabell and required settlement proposals to Defendants.

1/18-19/2022

**2.2 hours**

Email from Attorney Suzanne Elovecky representing Dawn Dorland regarding abuse of process claim; research; email and follow-up telephone conversation with Sonya Larson; preparation of settlement proposal as ordered by Magistrate Judge Donald Cabell in preparation for upcoming mediation; conference telephone conversation with Attorney Elovecky and Matthew Green, research, telephone conversation with Sonya Larson.

1/20 thru 23/22

3.0, 3.0, 2.0, 4.5 =

**12.5 hours**

More work on mediation memo for Judge Cabell.

1/24/2022

**3.5 hours**

Continuation of work on mediation memorandum; emails to and from Larson; filing of final memorandum with Judge Cabell's clerk.

2/1-2/2022

**5.1 hours**

Additional reading of NY Times article, "Who is the Bad Art Friend" in preparation for mediation; telephone discussion with Larson in preparation for mediation; mediation with all parties before Judge Cabell.

2/7, 10 thru 15/2022

.3, .5, 1.5, 1.0, 2.3, 1.5,  
1.0, 2.4 =

**10.5 hours**

Research actual damages under Copyright Act; telephone conversation with Larson regarding suggested language for Attorney Elovecky; begin work on Opposition to Motion for Reconsideration; research; electronic court filing from Judge Talwani denying motion for reconsideration; email to Larson; begin work on joint statement.

2/16 thru 20/2022

.4, 1.7, 1.5, .3, .3 =

**4.2 hours**

Review of draft response from Larson; long email to Larson with comments; consult with Attorney Lucy Lovrien; more work on letter to Attorney Elovecky; email to client's telephone conversation with Larson; response with changes to counter-proposal transmission to Elovecky; email to/from Larson and response to Elovecky question.

2/28/2022

**3.9 hours**

Draft of letter to Suzanne Elovecky, Esq., attorney for Dawn Dorland, email to Sonya Larson; legal research; work on possible Motion for Summary Judgment regarding copyright issues only.

3/2, 3 & 8, 2022

**3.4 hours**

Revisions to letter to Atty. Elovecky, email to client, feedback from client and additional revisions to letter; additional legal research especially derivative works under Copyright Act; additional refinements to draft Motion for Summary Judgment regarding copyright issues only.

3/17, 18 & 21, 2022

**.9 hours**

Draft of letter to Judge Donald Cabell regarding mediation; back and forth emails with Sonya Larson and Attorney Elovecky; final revisions to letter to Judge Cabell with email exchanges.

3/22, 24 & 31, 2022

**8.5 hours**

Writing and legal research on Motion for Summary Judgment dealing exclusively with copyright issues; telephone conference with Judge Cabell regarding mediation, discussion regarding damages and attorney's fees in copyright infringement actions and that Dorland is not entitled to attorney's fees because she did not register her Facebook letter in a timely fashion but that Larson is entitled to attorney fees under First Circuit opinion directly on point; preparation of red-lined changes to Dorland letter.

4/6 & 7, /2022

**.8 hours**

Revisions to letter in settlement of Dorland's copyright claims, discussions with Sonya Larson, email to Attorney Elovecky, email to Larson regarding response from Atty. Elovecky to red-lined letter.

6-2-3/2022

**.3 hours**

Review of request from attorney Suzanne Elovecky, Esq., attorney for Dawn Dorland Perry, to request scheduling conference regarding summary judgment motions. Review of proposed request to Judge Talwani and email to Attorney Elovecky stating no objection

6/13-15/2022

**5.3 hours**

Research and preparation of outline of copyright portion of Memorandum in support of Motion for Summary Judgment; totally relevant to counterclaims for copyright infringement. Sent draft of outline to client for review and comment along with letter and request from Elovecky – estimated half time related to copyright claims. Refinements to copyright memo outline and preparation for Zoom Court Appearance before Judge Talwani; totally relevant to counterclaims for copyright infringement.

6/30/2022

**3.3 hours**

Reading and highlighting of Day 1 of Dawn Dorland Perry deposition transcript; totally relevant to copyright infringement issues.

7/4/22

**6.6 hours**

Reading deposition Day 2 of Dorland deposition; taking notes, prep of more facts

7/5/22

**4.6 hours**

More work of facts; review of documents



7/6/22	<u>5.0 hours</u>	More work on memo
7/7/22	<u>5.4 hours</u>	Additional work on memo
7/8/22	<u>5.0 hours</u>	Research, preparation, more work
7/9/22	<u>1.1 hours</u>	Legal research
7/10/22	1.2, 2.0, 2.7 = <u>6.9 hours</u>	Continued work on memo
7/11/22	<u>1.2 hours</u>	More work on memo
7/16-19/22	1.5, 1.8, 1.5, 1.0, .5, .6 = <u>6.9 hours</u>	Research, preparation, letter to client, reread Bassichis v Flores, email to Miles Siegle, Esq. Finished Dorland Dep, day 2, telephone call with client.
7/20/22	<u>1.7 hours</u>	Research, fact investigation, preparation
7/21/22	<u>.8 hours</u>	Rule 7.1 conference with Suzanne Elevecky and Matt Green, follow up with motion by Green to extend time.
8/4/22	<u>.8 hours</u>	More work on memo

8/12/22

**1.2 hours**

More work on memo

9/8-29/22

6.0, 3.8, 2.9, .5 =

**13.2 hours**

Work on memo and motion incorporating changes requested by Larson.

1/1-9/23

3.0, 2.3, 3.0, 1.8, 1.5,  
1.1, 2.3, 1.0, 1.0, 2.0, .8,  
1.3, .9, 1.6, 1.2, 1.4, 1.3,  
1.7, 1.5, 1.1, 3.0, .8,  
2.5 =

**38.1 hours**

Preparation over numerous days and filing of response to statement of material facts, reply to response to motion for summary judgment with attachments and affidavit of Larson.

1/18/23 to 2/1/23

Contemporaneous time not recorded

Preparation of opposition to Dorland Motion to Strike Larson statement of material facts with supplemental affidavit.

2/17/23

Contemporaneous time not recorded

Preparation and filing of Motion to seal affidavit containing confidential medical information.

7/18/23

Contemporaneous time not recorded

Preparation and filing of assented to motion to file supplemental memo regarding U.S. Supreme Court decision in Warhol Foundation v. Goldsmith.

7/20/23

Contemporaneous time not recorded

Preparation of letter request regarding U.S. Supreme Court decision in Warhol Foundation v. Goldsmith.

8/22/23

3.0, 5.0, 1.5 =  
**9.5 hours**

Preparation for and appearance in court for oral argument of competing Motions for Summary Judgment.

9/14/23

**2.2 hours**

Review of Judge Talwani Memorandum and Order on competing Motions for Summary Judgment. Telephone conversation with Sonya Larson. Email to various attorney who aided with this action, research on attorney's fees.

9/15/23

**2.3 hours**

Telephone conversation with Atty. Aaron Silverstein and with client, research.

9/26/23

Contemporaneous time not recorded

Preparation and filing of Motion for Reconsideration and Memo regarding decision relative to intentional interference claim.

**SUMMARY OF TIME AND EXPENSES**

Total time from February 26, 2020 through September 26, 2023 (as allocated)= 677.7 hours

**687.2 hours @ \$500/hour = \$343,600.00\***

**CASE EXPENSES: 4/24/20 TO DATE**

1) Deposition transcripts:

Transcript of Sonya Larson - \$961.10

Transcripts of Larson, Dorland and the Cohen Defendants. \$3,626.10

Deposition transcript of Dorland - \$1,060.05

Total: \$6,707.03

2) Supplies and Miscellaneous items: \$824.91

3) Copies: 6,413 copies @ .15 each = \$961.95

4) Postage: \$580.18

**Total expenses: \$9,074.07\***

**\*GRAND TOTAL TIME AND EXPENSES: \$352,674.07**